

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. -
CALVIN HUDSON, :
JABRON GREEN, :
a/k/a "Zuzy," and :
CHARLES KENYATTA, :
a/k/a "Charlie," :
Defendants. :
----- X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOC #: JUL 08 2019
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: SEALED INDICTMENT

: 19 Cr. ____

19 CRIM 496

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2013, up to and including in or about 2018, in the Southern District of New York and elsewhere, CALVIN HUDSON and JABRON GREEN, a/k/a "Zuzy," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CALVIN HUDSON and JABRON GREEN, a/k/a "Zuzy," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that CALVIN HUDSON and JABRON

McMahon

GREEN, a/k/a "Zuzy," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Loansharking Conspiracy)

The Grand Jury further charges:

4. From at least in or about 2017 to the present, in the Southern District of New York and elsewhere, CALVIN HUDSON and CHARLES KENYATTA, a/k/a "Charlie," the defendants, and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to make extortionate extensions of credit, as that term is defined in 18 U.S.C. § 891(6), to wit, HUDSON, KENYATTA, and other co-conspirators, not named as defendants herein, extended one or more loans to an individual and used threats of force and economic harm to collect and to attempt to collect payment from that same individual.

(Title 18, United States Code, Section 892.)

COUNT THREE
(Extortion Conspiracy)

The Grand Jury further charges:

5. From at least in or about 2017 to the present, in

the Southern District of New York and elsewhere, CALVIN HUDSON and CHARLES KENYATTA, a/k/a "Charlie," the defendants, and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit extortion, as that term is defined in 18 U.S.C. § 1951(b)(2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), to wit, HUDSON, KENYATTA, and other co-conspirators, not named as defendants herein, used threats of force and economic harm to collect and to attempt to collect payment from an individual.

(Title 18, United States Code, Section 1951.)

FORFEITURE ALLEGATION AS TO COUNT ONE

6. As a result of committing the narcotics offense alleged in Count One of this Indictment, CALVIN HUDSON and JABRON GREEN, a/k/a "Zuzy," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of

the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNTS TWO AND THREE

7. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, CALVIN HUDSON and CHARLES KENYATTA, a/k/a "Charlie," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Asset Provision

8. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

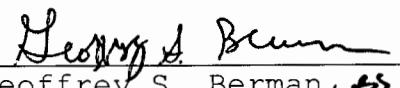
- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

(Title 18, United States Code, Section 1963(m); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).)



FOREPERSON



Geoffrey S. Berman
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CALVIN HUDSON, et al.,

Defendants.

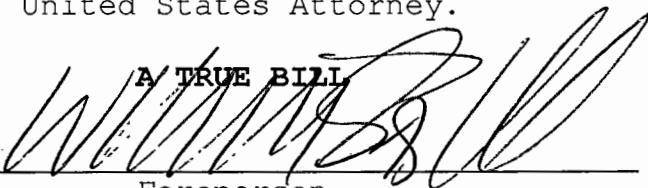
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(18 U.S.C. §§ 892 and 1951;
21 U.S.C. § 846.)

GEOFFREY S. BERMAN

United States Attorney.


A TRUE BILL
Foreperson.

7/8/19

Filed Indictment under seal
Arrest Warrant issued *USMJ Pitman*

MQ